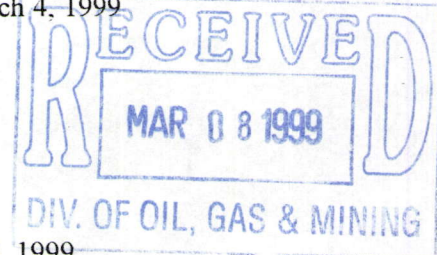


BRUSHWELLMAN
ENGINEERED MATERIALS

William M. Stokes
State of Utah
School and Institutional Trust Land Administration
675 East 500 South
Salt Lake City, Utah 84102-2818
801-538-5100

Brush Wellman Inc.
P.O. Box 815
Delta, Utah 84624
Phone 801/864-2701

March 4, 1999



Re: Response as Requested in Letter to Greg Hawkins Dated February 18, 1999

Dear Mr. Stokes:

Thank you for reviewing the proposed amendment to the mining and reclamation plan as submitted by Brush Wellman (BWI). Your conditional approval requested an explanation as to how BWI plans to protect the cultural resources. The following discussion provides baseline information as well as the measures taken to control the work.

First, note the sites which were classified as eligible for the national register are "not" within the project limits. The area selected for the inventory goes well beyond the project limits. This additional area was inventoried to allow for future mining and reclamation plan considerations.

The mine is located on public lands (Bureau of Land Management (BLM) and State of Utah). The BLM and State lands at the mine site are multiple use areas. Mining claimants, livestock grazers, rock hounds, hunters, recreational off-road vehicle owners, and others use the land around the mine. All work done by BWI is outlined in the mining and reclamation plan as approved by the Division of Oil, Gas and Mining. Amendments to the plan are generally the result of either increased knowledge of the ore bodies or shifts in long range market forecasts.

All mining activity is carefully planned and approved in advance. The limits, or extents, of any mine expansion are fully engineered. The approved plan is controlled from the start by survey methods. It is important to note that all mining equipment is kept strictly within the limits of the approved acreage disturbance. BWI mining control personnel are very adamant about staying within the bounds of any project.

It is BWI's policy that all employees obey the law. This includes the laws which protect the cultural resources. Employees are instructed to avoid any cultural resources which may be encountered while at work. It is also BWI policy to not advertise the existence or whereabouts of cultural resources and instructs its employees likewise.

Finally, it is the intention of BWI to adhere to the recommendations as listed in the cultural inventory report. Please refer to the report for these recommendations. Please feel free to contact me by telephone at (435) 864-1211 if you need further information.

Sincerely,

Greg G. Hawkins
Mine Manager

cc: Tom Munson, DOGM

/jrw